

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in compliance with D.N.J. LBR 9004-1(b)

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**IN RE:**

**GEORGE MORALES, JR.**

**Debtor**



Order Filed on November 4, 2024  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

Case No.: 24-16570-VFP


Chapter 13

Judge: Vincent F. Papalia

**CONSENT ORDER MODIFYING STAY AS TO MOTOR VEHICLE  
2019 Cadillac XT5 Utility 4D Luxury 3.6L V6**

The relief set forth on the following page, numbered two (2) and three (3) is hereby ORDERED.

**DATED: November 4, 2024**

  
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**Honorable Vincent F. Papalia  
United States Bankruptcy Judge**

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Caption of Order: Consent Order Modifying Stay as to Motor Vehicle

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1. Bridgecrest Credit Company, LLC as Servicer for Carvana, LLC (the "Movant"), who is the current holder of a Retail Installment Sale Contract and Security Agreement which is secured by a 2019 Cadillac XT5 Utility 4D Luxury 3.6L V6, V.I.N. 1GYKNCRS4KZ246994 and Debtor, by and through their undersigned counsel, have agreed to the following with respect to the Motion for Relief from Stay filed by Movant.
  - a. The Debtor will resume making regular monthly installment payment in the amount of \$896.00 as they become due Commencing on October 28, 2024.
  - b. Debtor will make payment of \$1,683.00 on or before October 31, 2024.
2. The term "payment" as set forth in Paragraph 1, supra, does not include a check that is returned due to insufficient funds, account closed or is otherwise not capable of negotiation for any other reason.
3. Debtor will be in default under the Consent Order in the event that Debtor fails to comply with the payment terms and conditions set forth in above Paragraph 1, supra. If Debtor fails to cure the default within thirty (30) days from the date of default, Movant may apply on five days' notice to Debtor, Counsel for Debtor and the Chapter 13 Trustee for an order lifting the automatic stay imposed under 11 U.S.C. §362(a) and permitting Movant to exercise any rights under the loan documents with respect to the motor vehicle including, but not limited to, initiating and completing a sale of the motor vehicle without regard to any future conversion of this matter to a different form of bankruptcy.
4. In the event Debtor convert to a bankruptcy under any Chapter other than Chapter 13 of the Bankruptcy Code, then Debtor shall pay all pre-petition arrears and post-petition delinquent payments, fees, and charges due and owing within fifteen (15) days from the date the case is

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converted from Chapter 13 to any other Chapter. If Debtor fails to make payments in accordance with this paragraph, then Movant, through counsel, may file a Certification of Default setting forth and failure and Movant shall be granted immediate relief from the automatic stay under the provisions of Section 362 of the Bankruptcy Code (11 U.S.C. §362). The Movant is then permitted to exercise any rights under the loan documents with respect to the motor vehicle including, but not limited to, initiating, and completing a sale of the motor vehicle. The failure of Movant to issue a notice of default will not be construed or act as a waiver of any of the rights of Movant under the Consent Order.

5. Debtor waives the fourteen (14) day stay provided under Rule 4001(a)(3), F.R.B.P.

**We hereby consent to the form and entry of the foregoing Order.**



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Regina Cohen  
Attorney for Bridgecrest Credit  
Company, LLC as Servicer for  
Carvana, LLC



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Paul S. Evangelista  
Attorney for Debtor